

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE CITIGROUP INC. BOND LITIGATION

Master File No. 08 Civ. 9522 (SHS)

**ECF Case**

**NOTICE OF BOND PLAINTIFFS' MOTION TO COMPEL PRODUCTION  
OF DOCUMENTS WITHHELD BY THE CITIGROUP DEFENDANTS  
BASED ON THE "BANK EXAMINATION" PRIVILEGE**

PLEASE TAKE NOTICE that upon the accompanying Bond Plaintiffs' Memorandum of Law In Support Of Their Motion To Compel Production Of Documents Withheld By The Citigroup Defendants Based On The "Bank Examination" Privilege, the accompanying Declaration of John C. Browne In Support Of Bond Plaintiffs' Motion To Compel Production Of Documents Withheld By The Citigroup Defendants Based On The "Bank Examination" Privilege and the exhibits thereto, and any additional materials subsequently submitted by Bond Plaintiffs, Bond Plaintiffs Louisiana Sheriffs' Pension and Relief Fund, Minneapolis Firefighters' Relief Association, City of Tallahassee Retirement System, Miami Beach Employees' Retirement Plan, Southeastern Pennsylvania Transit Authority, City of Philadelphia Board of Pensions and Retirement, and American European Insurance Company, and proposed class representatives Arkansas Teacher Retirement System, Phillip G. Ruffin, and James M. Brown hereby move this Court, in Courtroom 23A of the Daniel Patrick Moynihan Courthouse at 500 Pearl Street, New York, New York, at a date and time to be set by the Court, pursuant to Rule 37(a)(3)(B) of the Federal Rules of Civil Procedure, and any other applicable rule, for an Order compelling production of documents being withheld by the Citigroup Defendants on the purported basis of the bank examination privilege. Pursuant to Local Civil Rule 6.1(a), the Citigroup Defendants' opposition, if any, is due by May 20, 2011.

Dated: May 13, 2011

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